UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

339229

June 23, 1980

Mr. Ed Lecarreaux, President
Duane Marine Corporation
26 Washington St.
Perth Amboy, N. J. 08861

Dear Ed:

Attached please find a copy of a proposed revision to 40 CFR 112, the Spill Prevention Control and Countermeasure regulation.

Since you are preparing a new SPCC plan you may want to consider the proposed changes and the allowance for their incorporation into your future SPCC program if and when they become final. I have not had any briefing on these regulations or how they will dovetail into existing regulations, but I would strongly advise you to contact Mr. Gluckstern, for guidance in planning for these eventualities.

Very truly yours,

Michael V. Polito
Emergency Response & Hazardous
Materials Inspection Branch

Enclosure

cc: H. Gluckstern

2-SA-ERHMI:MPolito:dks:Bldg.209:X6652:6-21-80

CONCURENCES								
SYMBOL	2-SA-ERHMI							
SURNAME	Polito	Rubel						
DATE	6/10							

EPA Form 1320-1 (12-70)

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Rcd 6/9/80

4 June 1980

Mr. Gluckstern
EPA Region II
26 Federal Plaza
NY, NY 10007

Re: Duane Marine SPCC Conformance

Dear Mr. Gluckstern:

As a result of a meeting with Michael Polito on May 23, 1980 at Duane Marine, an oil spill contingency plan covering the interim storage of approximately 3000 drums is succinctly described in this letter. As stated by Michael Polito, this contingency plan will satisfy EPA's SPCC requirements until a permanent storage area for 3,000 drum capacity is developed and included in the revised SPCC plan which will be submitted by July 7, 1980

Oil Spill Contingency Plan

Drum Storage Areas

The drum storage areas are shown in the attached facility drawing at the north end of the property near the waterfront concrete retaining wall. Drums are being removed at the rate of approximately 100 drums/day with approximately 3,000 drums to be removed. There are basically three drum storage areas with a temporary sand-bag dike lined with plastic sheeting and covered with sand. The Spill Contingency Plan will address the possibility of 1 barrel of oil spilling within the diked area, leaking through the sand-bag dike and flowing over the concrete retaining wall into the Arthur Kill.

Spill Response Capability

In that Duane Marine is a spill cleanup contractor registered with the NJDEP, there exists onsite more than enough boons, skimmer, vacuum truck, sorbent material, and other cleanup equipment necessary to provide a strong cleanup/response as contingency should a spill occur. Likewise, Duane Marine employs highly qualified personnel who operate this equipment routinely as a professional service to clients who have oil spill problems.

Spill Response Time

In that this equipment and these personnel are located at the drum storage site, response time would be almost immediate following detection of a leaking drum or seepage through the dike walls. Since the largest container is a 55 gallon drum, only that amount of oil need be considered

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for the worst case. Drums are stored in rows such that drums nearest the shoreline contain heavy/viscous materials (e.g. industrial glues, epoxy etc.) and drums containing liquid materials such as oily wastes are farthest removed from the shoreline. This allows for maximum response time should a drum containing oil begin to leak.

Assuming that a 55 gallon drum of oily material began leaking at the rate of 1 gal/hr. oily material would flow towards the shoreline and encounter the temporary sand-bag dike within say 25 ft. Using a seepage flow velocity of 1 ft./min. the oil would reach the sand-bags guarding the shoreline in approximately 25 minutes. Oil would begin to build up at the dike wall until that portion of the 55 gallon drum above the leak had leaked out-for worst case we will assume 55 gallon leaks out/ The total volume of oil retained at the dike wall would be 55 gallon minus residual oil lost along the flow path. Amount of time allowed to spot the leak and initiate corrective action would be 25 minutes plus the retention time provided by the dike wall. To allow for additional leak detention time, sorbent material (e.g. Sorbent C) will be placed along /within the shoreline dike wall. Also, detection probability is enhanced by the fact that workers are constantly in the area during each work day, working to remove the drums and alleviate the potential spill problem.

Once the leak is detected, equipment close at hand (i,e, vacumm trucks, booms, skimmers, sorbent, etc.) would be employed immediately to contain the spill at the shore side or in the unlikely event it should reach the water, to contain the spill within booms to prevent spreading into the Arthur Kill. The deployment of this equipment during the working day would take approximately:

Sorbent Material	15 minutes
Vacuum Truck (assumed in use)	15 minutes
Boom	30 minutes
Skimmer	45 minutes

Routine inspections will be carried out at the start and end of each day to monitor for leaks during the drum removal operation. Soon after the drums are removed, a permanent drum storage area will be designed with permanent dikes and a complete drainage system including the proper handling of oily rainwater.

Sincerely yours,

Edward LeCarreaux, President
Duane Marine Corporation

cc: Mr. Frank Journick
Mr. Mike Polito ✓

TEMPORARY DIAGRAM